

In the United States District Court
for the District of Massachusetts

UNITED STATES OF AMERICA)
) CR. NO. 04-MJ-01751-CBS
 v.)
)
 GILMARI PADILLA)

Government's Assented-to Motion to
Continue Hearing and Report Case

The United States, with the assent of defendant Gilmari Padilla, hereby moves that the identity hearing presently scheduled for October 1, 2004 be continued on the ground that defendant has indicated her intent to plead guilty to the charges and thereby waives the identity hearing, without prejudice if the current plea negotiations fail.

Because it is expected that those negotiations will not fail, having been substantially completed, the parties request that the case be reported to the district court for a Rule 11 hearing at the Court's earliest convenience.

Respectfully submitted,

MICHAEL J. SULLIVAN,
United States Attorney

/s/thomas e. kanwit
THOMAS E. KANWIT
Assistant U.S. Attorney

Assented to:

GILMARI PADILLA, Defendant

/s/ george f. gormley
GEORGE F. GORMLEY, Esquire
Counsel for Defendant